

PUBLIC AUCTION YARDS
OF BILLINGS, MONTANA
P. O. Box 1781 Phone (406) 245-6447



June 9, 2005

Regulatory Analysis & Development, TPD, APHIS, Station 3C71,
4700 River Road, Unit 118
Riverdale, MD 20737-1238

Comment: Docket 05-015-1
RE: National Animal ID System

My name is Patrick K. Goggins, Box 30758, Billings, MT 59107, (406) 245-6447. I own the Public Auction Yards and the Billings LiveStock Commission Co in Billings, MT, the largest livestock auction markets in the Northwest. I also own Vermilion Ranches where we raise registered and commercial Angus cattle. We develop breeding cattle and steers in a backgrounding program. We own and sell approximately 20,000 of cattle each year from our ranches.

I and many of our customers are not totally against animal identification, but are vehemently against the situation as proposed by the USDA which will, in fact, be no more, no less a TRANSFER OF LIABILITY. This transfer of liability for the packing industry should not be allowed.

When calves are born on the various farms and ranches, these folks cannot be expected to assume all the liability on that animal when it leaves their farm or ranch as it moves through the various rungs and ladders of the industry finally ending up at the retail store. There are too many exposures to problems along the way for any farmer or rancher to be expected to accept that responsibility.

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We have come up with an idea for all of our customers, and that's a tremendous amount of them in this regard. We call it VISA program. VISA stands for Verified Individual ID'd Source & Age program. A farmer or rancher could purchase an electronic tag from his state livestock health department which would include their herd number, the name, address and phone number of the breeder, the ID number and location. The farmer or rancher, when he shipped his cattle would get a health certificate from a veterinarian and the veterinarian would put these tags into the ear. After an inspection, he would issue the health of the animals, verify their soundness and that health certificate would follow the cattle. That's where the limits of liability to that farmer or rancher would start and stop. If the cattle are shipped to a stockyards, it would not be necessary to read the tags; if they go from the stockyards to various backgrounders or grass operators, they would not need to be read; if they go on for finishing, they would not need to be read. But, in each station of their life, if the owner or the buyer chose to read those tags for whatever reason, he has that information available to him. In the event of some disease or some problem that could occur in an animal, that responsibility could not be put back onto the ranch or farm of origin. There are too many unexplained exposures in this animal's life to attempt to put that responsibility of liability back onto the grower of that calf.

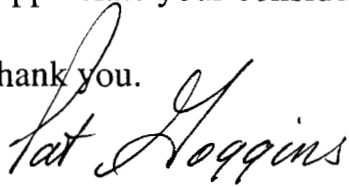
From the standpoint of the livestock marketing industry of the United States, understand that approximately 57% of all livestock in the US are merchandised through a livestock auction or merchandising center. Also realize that the average size of a cow herd in the United States is only 31 head. So, of the 96 million cattle presently in the US, a massive amount of these numbers that go through the stockyards are coming from herds of much less than 31 head size. You can see the maize of problems that would ensue if it was required to have a paper trail where all of these cattle went throughout their life – to whom, when, how – it simply will not happen. If you pursue along this line, you are not going to make it happen.

I have spent over 50 years in this industry. I've been president of the Livestock Marketing Assn. of the United States and a director for many, many years. We represent the approximately 1200 livestock auction markets who merchandise these cattle across America and I can tell you from first hand experience, it will not happen.

The VISA idea has a chance and I think the industry, if it is presented to them in a mandatory way, can work their way through it easier than any other method I have read.

I appreciate your considering this.

Thank you.

A handwritten signature in cursive script, reading "Pat Goggins". The signature is written in black ink and is positioned above the printed name.

Patrick K. Goggins, President
Public Auction Yards, Billings, MT